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VIA ELECTRONIC FILING

The Honorable Leonard P. Stark
Chief United States District Judge
J. Caleb Boggs Federal Building
844 North King Street
Wilmington, Delaware 19801

Crystallex International Corp. v. Bolivarian Republic of Venezuela,
No. 1:17-mc-00151-LPS

Dear Chief Judge Stark:

We represent the Intervenor Bondholders,¹ which were permitted to intervene in and made parties to the *Crystallex Asset Proceeding* by this Court's Order dated December 12, 2019. D.I. 154. We respectfully request that the Court defer consideration of the Proposed Order Regarding Special Master filed with the Court earlier this Sunday evening, May 9, 2021 (D.I. 260-1, the "Proposed Order"), to permit the Intervenor Bondholders, the other parties, and the Special Master to meet and confer regarding its contents.

The Proposed Order, in the form submitted to the Court, was not shared with the Intervenor Bondholders before its submission. The Proposed Order reflects substantive changes from the most recent draft shared with the Intervenor Bondholders. In particular, the Proposed Order, in contrast to prior versions, includes a defined term "Parties" that excludes the Intervenor Bondholders. D.I. 260-1, at 2 n.1. That definition, in turn, would exclude the Intervenor Bondholders from the "Parties" to which the Proposed Order grants important rights, including the

¹ The "Intervenor Bondholders" are Blackrock Financial Management, Inc. and its affiliates, on behalf of certain client funds and accounts under management, and Contrarian Capital Management, L.L.C., also on behalf of client funds and accounts that it manages, as holders of bonds issued by Petróleos de Venezuela, S.A.

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right to participate in the meet-and-confer process leading to any Sales Procedure Order and the right to file objections before this Court. *See* D.I. 260-1 ¶¶ 3-6, 8-10, 19.

We have requested a meet and confer with the other parties and the Special Master to address this issue. In the interim, we respectfully request that Your Honor refrain from entering the Proposed Order that was submitted earlier this evening.

As always, counsel remain available at the convenience of the Court.

Respectfully submitted,

/s/ Daniel A. Mason

Daniel A. Mason

cc: Counsel of Record (Via ECF)